

MAY 11 1998



SACRAMENTO COUNTY RESOURCE CONSERVATION DISTRICTS
65 Quinta Court, Suite C, Sacramento, California 95823

May 8, 1998

CALFED Bay-Delta Program
1416 Ninth Street, Suite 1155
Sacramento, California 95814
Attn: Rick Breitenbach

RE: Draft Programmatic EIS/EIR

Mr. Breitenbach:

On behalf of the Lower Cosumnes Resource Conservation District, the following comments are offered in regards to the above mentioned program:

1. Review Period: The Programmatic EIS/EIR details many complex issues and proposals that have major impact to agriculture and the Delta Environment. CALFED has developed these proposals over several years, yet time available for review is limited. We strongly suggest the review period be extended to allow adequate time for review by landowners who will be most affected by future CALFED decisions.
2. Economic Impacts: We do not believe adequate attention has been provided to analyze impacts of proposals upon the economic livelihood of landowners and small towns throughout the Delta area. Page 109 of the Interim Report states "alternatives will not significantly change socioeconomic impacts." We strongly disagree with this conclusion. Just the proposed plans for acquisition and/or easement programs will significantly impact agricultural operations throughout the Delta. Factor in the "multiplier" effect of economic contributions that agriculture makes and CALFED should be able to see that each proposed alternative would indeed have significant economic impact.
3. Landowner Rights: The Programmatic EIS/EIR does not provide for study of impacts to landowners "right to farm", nor potential impacts regarding property rights. Please incorporate analysis of the alternative impact to landowners rights and agricultural operations.
4. Easement Programs: The RCD is concerned with the expansion of public owned lands and easement programs in the Delta area before CALFED has adopted overall policies and plans for these kinds of efforts. The acquisition of property and easement programs are being implemented "piecemeal" without regard to the final adopted plan by CALFED. On behalf of our Delta constituents, we encourage that agencies such as the California Wildlife Conservation Board, Fish and Game, Natural Resources Conservation Service and others delay acquisition or easement purchase until CALFED

has adopted an overall plan that will guide such programs. Such delay will allow Delta landowners to be informed about future direction of these efforts and make best use of public funds for future land management consistent with CALFED goals.

5. Cosumnes River: The Cosumnes River Watershed has a major impact upon land use management decisions in the Bay-Delta. Resource Conservation Districts and the County of Sacramento have initiated a watershed planning process and Task Force to examine options for flood and land use management that will have a significant impact for decisions throughout the Delta. We invite active participation by CALFED member agencies to ensure that these two planning efforts will complement resource objectives and needs of agriculture.

We look forward to your response and cooperation.

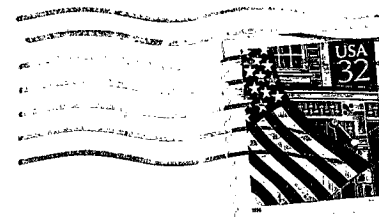
Sincerely, *Bill Shelton*

BILL SHELTON
PRESIDENT, LOWER COSUMNES RCD

cc: Florin RCD
Sloughhouse RCD
Don Notolli, Sacramento County
Pete Wilson, Governor, State of California
Calif. Association of RCDs
Pearlie Reed, USDA NRCS
Henry Wyman, USDA NRCS
Representative Richard Pombo
Representative Vic Fazio
Representative Robert Matsui
Representative John Doolittle
US Senator Dianne Feinstein
US Senator Barbara Boxer
Assembly Member Barbara Alby
Assembly Member Deborah Ortiz
Assembly Member Larry Bowler
Assembly Member Helen Thomson
State Senator Patrick Johnson
State Senator Maurice Johannessen
Delta Protection Commission
Calif. Dept of Fish & Game
Calif. Dept. of Water Resources
Calif. State Water Resource Control Board
US Fish and Wildlife Service
US Army Corps of Engineers
US Environmental Protection Agency

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DEPARTMENT OF
WATER RESOURCES
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